

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

Honorable Thomas Vanaskie
(Ret.), Special Discovery Master

**NOTICE OF MOTION TO
PARTIALLY STRIKE
PLAINTIFFS' REPLY BRIEF**

**NOTICE OF MOTION TO PARTIALLY STRIKE REPLY BRIEF IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF
DOCUMENTS WITHHELD AS CHINESE STATE SECRETS, OR FOR
LEAVE TO FILE A SUR-REPLY**

To: Adam M. Slater, Esquire
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PLEASE TAKE NOTICE that on June 1, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER partially striking Plaintiffs' Reply Brief in Support of Plaintiffs' Motion to Compel Production of Documents Withheld as

Chinese State Secrets. Alternatively, the ZHP Parties request the Court grant the ZHP Parties leave to file a sur-reply to address Plaintiffs' new arguments, and request the Court deem the accompanying brief the ZHP Parties' sur-reply.

PLEASE TAKE FURTHER NOTICE that a Certificate of Service attesting to the date and manner of service is submitted herewith.

June 1, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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